

Comments on 6-25-93 Draft Work Packages

Comments were restricted to Scope Summary and Planning Assumptions, Milestones, and Basis of Estimate Documentation. In general, no comments on funding or schedule were made because the level of funding and the schedule was agreed to under the "current conditions" scenario by DOE and EG&G management.

General Comment.

The external milestones for submittal to EPA/CDH need to be preceded by an external milestone for submittal to DOE, at least one week prior to the date due to EPA/CDH. This is necessary for DOE/RFO to prepare transmittal correspondence and get signatures.

**OPERABLE UNIT 2 WORK PACKAGES**

WP# 12050	O&M
WP# 12052	IRA Plan
WP# 12053	Construction
WP# 12054	Design
WP# 12055	Testing & Ops
WP# 12057	Remedial Investigation
WP# 12058	Treatability/Feasibility Study
WP# 12065	Project Support

Operable Unit 1 has a work package for an Environmental Assessment in conjunction with the CMS/FS. When will this work package be prepared for OU2?

WP# 12050 O&M

- This draft does not cover the attempt to discontinue the collection of water from the three (or at least two) sources (SW-59, 61, and 132). Although planning for full operation is necessary, reduced operation should be mentioned.
- It should be noted in the narrative that even though operations of the treatment may be reduced from 24 hour operations, collection of water must continue for 24 hours a day.
- There needs to be a link between the Walnut Creek IM/IRA and the Subsurface IM/IRA as the Subsurface will be using the Walnut Creek System when vapor extraction begins in Sept 93.
- Analytical sampling can be reduced because the treatability studies are written. Although it is important to know influent, we are only required to sample the effluent (twice a week).
- What is activity 12050-400, Surface Water Interim Action Report (by Oct 31, 1993)?
- Basis of Estimate for activity number 12050-100, preparation of quarterly reports. The narrative states that "DOE has requested additional information." Clarify that the reports should not just present raw data, but do some review and interpretation of the data. This should be less involved because of the reduced analytical samples (since the treatability studies should be done), and there will be less data to review. We need to discuss scope and content of these quarterly reports.
- Basis of Estimate for activity number 12050-300, analytical sampling. "sampling events taken in FY94 will be identical to the FY93 sampling." This is not required because sampling in FY93 for data for the treatability studies, that will be completed. Reduced sampling is

ADMIN RECORD

A SW-000841

- appropriate The only required sampling is twice a week at the effluent. However, it makes sense to continue sampling at the effluent and do some sampling at some locations. Also, it may be appropriate to do screening level sampling rather than the expensive full-suite of samples
- Basis of Estimate for activity number 12050-400 the report is due September 8, not October. However, there may be some follow-on work/documentation necessary to document discontinuation of collection of water, such as an Explanation of Significant Differences
- Section 4.8, milestones in missing

#### WP# 12052 IM/IRA Plan

- There are four work packages for the Subsurface IM/IRA. It is unclear in the scope summary section, the purpose of this work package
- An important omission in the Subsurface IM/IRA documentation to date, is our commitment for post-pilot operation. Post-pilot operations may be necessary, based upon the results of testing at a specific test site (Section 5.2 of the IM/IRA). Although not discussed in any detail, the expectation of the IM/IRA was that if significant removal of taking place at the end of the test, we would be expected to continue in a "post-pilot" phase. **The work packages for the Subsurface IM/IRA need to consider and plan for this possibility for FY94 and onward.**
- As a "placeholder," there should be some level of funding for 3D modeling of the pilot tests using Dynamic Graphics software. Figure are to be included in the Pilot testing reports to reflect area of influence. Based on work to date, this is not a major time or cost, if done in-house. Also, public/oversight committee (Rocky Flats Cleanup Commission) comments on using more 3D modeling can be used as a driver
- There is the statement "no interfaces with other W P 's " What about the use of the Surface Water IM/IRA treatment facilities
- Section 4.8, milestones in incomplete

#### WP# 12053 Construction

- A technical assumption is that test 3 will be in the Mound area (we just told EPA/CDH that there was insufficient contamination to do testing in the Mound area). If the steam stripping occurs, it was planned for the 903 Pad area. The planning should incorporate the requirements to test in the 903 Pad area because of the inherent greater costs of working in a rad-controlled area
- There is the statement "no interfaces with other W P 's " What about the use of the Surface Water IM/IRA treatment facilities
- There is the statement "no interfaces with other W P 's " The agreed approach for implementation of steam stripping was successful bench scale testing, funded by EM-50. Additionally, we need to specify co-funding from EM-50 for pilot scale testing. **UNLESS WE WANT TO DO IT WITHOUT EM50 due to the administrative requirements of EM-50**
- Section 4.8, milestones in missing

#### WP# 12054 Design

- There is scope summary, planning assumptions in this version (Sections 4.11 and 4.12), so I cannot comment of scope or planning assumptions
- Basis of estimate for test site #2 needs to consider the bullets under comments of WP# 12053

Section 4 8, milestones in missing

- A technical assumption is that test 3 will be in the Mound area. If the steam stripping occurs, it was planned for the 903 Pad area. The planning should incorporate the requirements to test in the 903 Pad area because of the inherent greater costs of working in a rad-controlled area

WP# 12055 Testing and Ops

- There is scope summary, planning assumptions in this version (Sections 4 11 and 4 1 2), so I cannot comment of scope or planning assumptions
- Basis of estimate for test site #2 needs to consider the bullets under comments of WP# 12053
- An important omission in the Subsurface IM/IRA documentation to date, is our commitment for post-pilot operation. Post-pilot operations may be necessary, based upon the results of testing at a specific test site (Section 5 2 of the IM/IRA). Although not discussed in any detail, the expectation of the IM/IRA was that if significant removal of taking place at the end of the test, we would be expected to continue in a "post-pilot" phase. **The work packages for the Subsurface IM/IRA need to consider and plan for this possibility for FY94 and onward.**
- The Section 4 8 milestones does not reflect the external milestones shown in the detailed schedule

WP# 12057 Remedial Investigation

- It may be overly optimistic to assume that (1) that an OU-specific be allowed by EPA/CDH and (2) the RFI/RI report will require only minor corrections
- For planning purposes, I don't think we can assume one OU-wide risk assessment, but also not the four risk assessments agreed for OU1. To make sure we have sufficient funding, it would be prudent to plan for up to four or plan for time and expenses for dispute resolution. Based on the OU1 experience and the current "run-a-round" from OU2. Memo to Benedetti this week says

Your proposed "Option 1" puts us at risk of the Draft RFI/RI Report being found unacceptable by EPA/CDH which could extend the period of time we are subject to stipulated penalties. This approach is unacceptable without first obtaining resolution with EPA and CDH on the approach for the risk assessment. Therefore, we must first meet and reach agreement with EPA/CDH. If we cannot reach agreement with EPA/CDH on an acceptable approach, then you must be prepared to support dispute resolution under the IAG

- The RFI/RI report will likely require more than "minor" corrections, based upon the "expedited" timeframe to complete the draft, and the experience on OU1. OU1 is a "simple" OU relative to OU2
- The Phase II RFI/RI Report is supposed to contain all historical data, including that from Phase I. I did not see this in the assumptions
- External Milestones should include the draft and final risk assessment Technical Memorandums
- As a "placeholder," there should be some level of funding for 3D modeling of the pilot tests using Dynamic Graphics software. Figure are to be included in the Pilot testing reports to reflect

area of influence. Based on work to date, this is not a major time or cost, if done in-house. Also, public/oversight committee (Rocky Flats Cleanup Commission) comments on using more 3D modeling can be used as a driver.

#### WP# 12058 Treatability/Feasibility Study

- Section 4.1.2. Although there is nothing in writing, we have verbal information that EM-40 may specify that for each OU, an innovative technology is to be considered as part of the feasibility study process. We should assume that this will be the case.
- The external milestone section includes submittal of the treatability work plan to EPA/CDH but this is not explained in the scope summary and assumptions. Although the "IAG Task Requirements/Duration flow chart does not include EPA/CDH input into the treatability studies of the FS, it is hard to believe that we will be able to spend the 26 months (3 months in the IAG) between the submittal of the Final RFI/RI Report and the Draft CMS/FS Report without some agency coordination of OU activities. Rationale should be expanded.
- It is unclear why we should not be able to start the Treatability Study Work Plan prior to FY94 rather than FY95.
- It appears that only one treatability test will be performed. It would appear that due to the complexity of OU2, that more than one study would be necessary.

#### WP# 12065 Project Support

- An important omission in the OU planning is for the Subsurface IM/TRA documentation. We may need to implement our commitment for post-pilot operation. Post-pilot operations may be necessary, based upon the results of testing at a specific test site (Section 5.2 of the IM/TRA). Although not discussed in any detail, the expectation of the IM/TRA was that if significant removal of taking place at the end of the test, we would be expected to continue in a "post-pilot" phase. The work packages need to consider and plan for this possibility for FY94 and onward.
- The assumption that one seminar will be the extent of training implies that your staff know it all. I don't think that is the case. Additional training should be planned.
- Is this the appropriate WP for funding for payment of stipulated penalties for the Draft RFI/RI Report missed Milestone. Nine months delay could result in stipulated penalties up to \$355,000.
- There is no mention of upgrading posting and access control of the the plutonium/americium contaminated areas. This is still an outstanding Tiger Team finding.

### OPERABLE UNIT 14 WORK PACKAGE

- This work package is incomplete. It does not contain any narrative or assumptions.

### SITEWIDE TREATABILITY STUDIES

- No specific comments at this time.